

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
SPOKANE DIVISION
CIVIL ACTION NO. 2:24-cv-00262-TOR**

BRIAN TACKETT individually, as
Personal Representative of the Estate
of Robbie Ann Tackett, and as
Guardian of Minor Children G.T. and
G.T.

PLAINTIFF

VS.

**PROVIDENCE SACRED HEART MEDICAL CENTER,
DR. KAVITHA CHAGANUR, M.D. DEFENDANTS**

**PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

I, the undersigned Plaintiff, submit this Reply to Defendants' Response to Plaintiff's Motion For Leave To File the Proposed Second Amended Complaint.

I agree with the objections the Defendants have made with respect to Dr. Ball and to the punitive damage claims. Dr. Ball is not in fact an indispensable party any more than Dr. Chaganur and there is no real necessity to add him as a party. And, apparently, punitive damages are not a remedy available under Washington State law.

However, this does not mean that I should not be permitted to amend the complaint with the additional facts necessary to indicate the relevance of evidence as the case moves forward. I have submitted herewith a revised proposed Second Amended Complaint omitting the addition of Dr. Ball as a party defendant and omitting the claim for punitive damages but leaving all the remaining proposed additions. As the Defendants have interposed no objections to this, hopefully this Honorable Court will allow these amendments to further align the complaint with the presently known facts. I seek to do this under the threat of an inability to do it later under the current scheduling order.

For these reasons, I request that this Honorable Court allow the filing of the attached unobjectionable Second Amended Complaint.

Date: 3-23-2025

Respectfully Submitted,

/S/ 

Brian Tackett

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662/544-4500

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Certificate of Service

I, the undersigned, hereby certify that I filed the above and all attachments with the United States District Court Clerk, via the electronic filing system, constituting service on all parties.

Date: 3-23-25

/S/ 

Brian Tackett